UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF TEXAS BROWNSVILLE DIVISION

UNITED STATES OF AMERICA, EX REL. MICHAEL N. SWETNAM, JR.,

Plaintiff,

VS.

VALLEY BAPTIST HEALTH SYSTEM AND VALLEY BAPTIST MEDICAL CENTER,

Defendants.

CASE NO. 1:08-CV-446

NOTICE OF SUBPOENA REQUESTING PRODUCTION FROM A NON-PARTY

TO: Defendants Valley Baptist Health System and Valley Baptist Medical Center, by and through their attorneys of record, Christopher Paul Hanslik and Michel Perez, Boyar & Miller PC, 4265 San Felipe, Suite 1200, Houston, Texas 77027.

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Please take notice that this Notice of Subpoena Requesting Production From a Nonparty is hereby made, pursuant to Rule 45 of the Federal Rules of Civil Procedure. Plaintiff, MICHAEL N. SWETNAM, JR., requests SMITH-REAGAN INSURANCE AGENCY to produce or to permit the undersigned attorney for Plaintiff, EDWARD W. ALLRED, to inspect and to copy or to reproduce the documents hereinafter designated on Exhibit "A" to the subpoena attached hereto, at BRYANT STINGLEY, INC., located at 2010 East Harrison Avenue, Harlingen, Texas 78550 [956.428.0755], on August 25, 2014, at 1:00 p.m., or at such other time and place as may be agreed upon.

No later than August 25, 2014, SMITH-REAGAN INSURANCE AGENCY shall serve a written response including the documents requested or stating with respect to each request that an inspection and copying or reproduction will be permitted as requested, unless the request is objected to, in which event, please state specifically the

legal or factual basis for the objection and the extent to which you refuse to comply with the request.

Respectfully submitted,

WATTS GUERRA LLP 300 Convent Street, Suite 100 San Antonio, Texas 78205 Telephone: 210.527.0500

Fax: 210.527.0501

By: <u>/s/ - Edward W. Allred</u>

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And

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> Rene L. Obregon State Bar No.: 24005445

ATTORNEYS FOR PLAINTIFF UNITED STATES OF AMERICA, EX REL. MICHAEL N. SWETNAM, JR.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing document was served on the following attorneys of record in accordance with the Federal Rules of Civil Procedure on this 25th day of July, 2014:

Christopher Paul Hanslik Edgar Saldivar BOYAR & MILLER PC 4265 San Felipe, Suite 1200 Houston, Texas 77027 Attorneys for Defendants Via Electronic Filing

Andrew A. Bobb Assistant United States Attorney Southern District of Texas P O Box 61129 Houston, Texas 77208 Attorneys for The United States of America Via Electronic Filing

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/s/ - Edward W. Allred Edward W. Allred